

Exhibit I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WALTER ELAM,	:	
	:	
<i>Plaintiff,</i>	:	
	:	Civil Action No. 15-cv-07215 (CM)
v.	:	
	:	
CONCOURSE VILLAGE, INC.,	:	<u>DEFENDANT'S FED. R. CIV. P.</u>
	:	<u>26(a) DISCLOSURES</u>
<i>Defendant.</i>	:	
-----X	:	

Defendant Concourse Village, Inc. ("Concourse Village" or "Defendant") by its attorneys, Clifton Budd & DeMaria, LLP, as and for its disclosures pursuant to Fed. R. Civ. P. 26(a)(1), discloses as follows:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

The following individuals are likely to have discoverable information that Defendant may use to support its claims or defenses, unless solely for impeachment, with the subjects of the information.

1. Walter Elam ("Plaintiff" or "Elam")
c/o The Harman Firm, P.C.
Information relating to Plaintiff's employment and the termination of his employment, the allegations in the Complaint and after-acquired evidence.
2. Sherill Henry
Former General Property Manager at Concourse Village
c/o Clifton Budd & DeMaria, LLP
Information relating to Plaintiff's employment and the termination of his employment, certain allegations in the Complaint, after-acquired evidence and Concourse Village's policies and procedures.

3. Leticia Bowry
President, Board of Directors, Concourse Village
c/o Clifton Budd & DeMaria, LLP
Information relating to Plaintiff's employment and the termination of his employment, certain allegations in the Complaint and Concourse Village's policies and procedures.
4. Anthony James
Lead Maintenance Supervisor, Concourse Village
c/o Clifton Budd & DeMaria, LLP
Information relating to Plaintiff's employment and the termination of his employment, certain allegations in the Complaint and Concourse Village's policies and procedures.
5. Christina Verney
Human Resources Coordinator, WinnCompanies
c/o Clifton Budd & DeMaria, LLP
Information relating to communications with Plaintiff on or about July 2, 2015.
6. Gail Badger
General Manager at Concourse Village
c/o Clifton Budd & DeMaria, LLP
Information relating to Plaintiff's personnel documents.

B. DOCUMENTS THAT MAY BE USED IN SUPPORT OF CLAIMS OR DEFENSES

The following documents, data compilations and tangible things are in the possession, custody or control of Defendant and may be used in support of its claims or defenses, unless solely for impeachment.

1. Documents concerning Plaintiff's employment at Concourse Village, including, but not limited to, documents concerning Plaintiff's job responsibilities, work performance, salary history and disciplinary history.
2. Documents concerning the termination of Plaintiff's employment.
3. Documents concerning Plaintiff's communications with Christina Verney on or about July 2, 2015.

4. Recordings, upon information and belief belonging to Plaintiff, found by Concourse Village at the workplace after the conclusion of Plaintiff's employment.

5. Documents concerning Plaintiff's time and attendance history.

6. Documents concerning Plaintiff's complaint filed with the New York State Division of Human Rights and Charge of Discrimination filed with the U.S. Equal Employment Opportunity Commission.

7. Documents concerning Plaintiff's allegations in the Complaint.

C. COMPUTATION OF DAMAGES CLAIMED BY DEFENDANT

Defendant has not asserted claims for damages against Plaintiff.

D. INSURANCE AGREEMENTS

Defendant is still investigating whether there is an insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment. Defendant will supplement this response.

Defendant reserves the right to amend or supplement these disclosures as provided under Fed. R. Civ. P. 26(e).

Dated: New York, New York
November 12, 2015

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP
Attorneys for Concourse Village, Inc.

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